UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

MANOR CARE OF YEADON PA, LLC

Employer

and

Cases 04-RC-196504 and 04-RC-197201

SEIU HEALTHCARE PENNSYLVANIA

Petitioner

EMPLOYER'S REQUEST FOR EXTENSION OF TIME TO FILE REQUEST FOR REVIEW

Now comes the Employer, ManorCare of Yeadon PA, LLC, by and through its attorneys, and hereby requests a 7-day extension of time to file a Request for Review of the Decision and Certification of Representative and the Decision and Direction of Election in each of the cases from the current due date of November 27, 2018.

The grounds for the requested extension in the consolidated cases are:

- 1. The current deadline presents a short filing period with an intervening Thanksgiving federal holiday, which presents scheduling issues of case preparation in the shortened workweek;
- 2. Undersigned co-counsel for the Employer, Leigh Tyson, is involved in multiple matters currently and the current deadline presents scheduling difficulties;
- 3. The planned Request for Review concerns three decisions in two consolidated cases.

On November 19, 2018, Employer's counsel attempted to obtain prior consent for this request from all parties for a mutual extension of all due dates by 7 days. By email on that date, Employer's counsel contacted Steven Grubbs, Regional Advocate for SEIU Healthcare Pennsylvania. Counsel Grubbs has not yet indicated a position on the requested extension.

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Based on the reasons above, the Employer respectfully requests that the request to extend the due date for filing the Request for Review by 7 days be granted and that prompt notice issue.

Requested this 20th day of November, 2018.

Respectfully Submitted,

/S/

Leigh E. Tyson David P. Phippen Counsel for the Employer

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the EMPLOYER'S REQUEST FOR EXTENSION OF TIME TO FILE REQUEST FOR REVIEW has been filed and served with the Board by the NLRB's official E-File system, and by e-mail to:

Regional Director for Region 22, David E. Leach, III -- <u>David.Leach@nlrb.gov</u> and also for him to Regional Director David E. Leach, III, c/o Isaaida.Carmona-Belliard, Secretary to the Assistant Regional Director -- Isaaida.Carmona-Belliard@nlrb.gov Steven Grubbs, Esq. -- steven.grubbs@seiuhcpa.org

This 20th day of November, 2018.

/S/

David P. Phippen Counsel for the Employer Manor Care of Yeadon PA, LLC

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